

PHILLIP A. TALBERT  
United States Attorney  
KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
APPROXIMATELY \$25,000.00 IN  
U.S. CURRENCY,  
  
Defendant.

CASE NO. 1:22-MC-00035-JLT

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Jesus Pedro Maldonado Ceja ("claimant"), by and through their respective counsel, as follows:

1. On or about December 1, 2021, claimant filed a claim in the administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately \$25,000.00 in U.S. Currency (hereafter "defendant currency"), which was seized on September 2, 2021.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the  
3 parties. That deadline was March 1, 2022.

4 4. By Stipulation and Order filed March 4, 2022, the parties stipulated to extend to May 2,  
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant property and/or to obtain an indictment alleging that the defendant property is subject to  
7 forfeiture.

8 5. By Stipulation and Order filed April 26, 2022, the parties stipulated to extend to July 31,  
9 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant property and/or to obtain an indictment alleging that the defendant property is subject to  
11 forfeiture.

12 6. By Stipulation and Order filed July 29, 2022, the parties stipulated to extend to September  
13 29, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
14 defendant property and/or to obtain an indictment alleging that the defendant property is subject to  
15 forfeiture.

16 7. By Stipulation and Order filed September 29, 2022, the parties stipulated to extend to  
17 November 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
18 against the defendant property and/or to obtain an indictment alleging that the defendant property is  
19 subject to forfeiture.

20 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
21 to December 28, 2022, the time in which the United States is required to file a civil complaint for  
22 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
23 currency is subject to forfeiture.

24 ///

25 ///

26 ///

27 ///

28 ///

1           9.       Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
3 alleging that the defendant currency is subject to forfeiture shall be extended to December 28, 2022.

4 Dated: November 28, 2022

PHILLIP A. TALBERT  
United States Attorney

5  
6                   /s/ Kevin C. Khasigian  
7 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

8  
9 Dated: November 28, 2022

/s/ Julissa Echevarria  
JULISSA ECHEVARRIA  
ROBERT L. FORKNER  
Attorneys for potential claimant  
Jesus Pedro Maldonado Ceja  
(As approved by email on 11/28/22)

10  
11  
12 IT IS SO ORDERED.

13  
14 Dated: **November 28, 2022**

  
UNITED STATES DISTRICT JUDGE